

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

|                          |   |                   |
|--------------------------|---|-------------------|
| UNITED STATES OF AMERICA | ) |                   |
|                          | ) | Criminal File No. |
| V.                       | ) |                   |
|                          | ) | 15 CR 082 TCB LTW |
| ANGELA WILLIAMS          | ) |                   |
| _____                    | ) |                   |

**DEFENDANT ANGELA WILLIAMS' MOTION FOR (1) PRE-TRIAL RELEASE; and**  
**(2) CANCELLATION OR MODIFICATION OF WRIT**

Angela Williams, by counsel, moves the Court pre-trial release on bond and such conditions of bond as the Court deems appropriate. In addition, she requests cancellation or modification of the open writ ad prosequendum to Mississippi.

By judgment dated Jan. 5, 2015 and entered Jan. 14, 2015, Ms. Williams was convicted of uttering forgery in the Circuit Court of Madison County, Hon. Chapman presiding, case no. 2014-0117 and 2014-0412. She was sentenced to five years. Importantly, the case pending in this Court is premised on the same conduct of which the Mississippi case was a part.

Ms. Williams was serving her sentence in Mississippi when she was brought to Atlanta on a writ of habeas corpus ad prosequendum, to answer the charges pending in this case.

Ms. Williams is a strong candidate for pre-trial release. She is a long-time resident of Georgia, and has four minor children residing here. Her husband is a co-defendant in this case. Her children are being cared for by her oldest child, a

17-year old, and friends. Ms. Williams has a 20-year record of steady work, and no prior criminal history whatsoever. She is charged in this case with non-violent offenses of aggravated identity theft, theft of government property (treasury checks), and conspiracy for same. The government will not seek detention if the foregoing information concerning Ms. Williams is corroborated by the pretrial services report.

Pre-trial bond has heretofore been moot, because Ms. Williams is in Atlanta pre-trial incarceration on writ. She becomes eligible for parole, however, in March, 2016, at a time before this case is likely to be concluded. More urgently, her hearings for parole in Mississippi commence sometime in December, 2015. Communication with the Mississippi Board of Pardons and Paroles yields the direction that Ms. Williams must be physically present, in Mississippi, for the parole hearing(s). That hearing has not been set, to Ms. Williams' knowledge, but Mississippi procedure is such that it may be set as early as December, 2015.

An evidentiary hearing on Ms. Williams' suppression motions is set in the instant case for December 21, 2015.

Ms. Williams' dilemma is that she is a candidate for pre-trial release on the Atlanta federal charges, but would not in the ordinary course be released, because she is on writ from doing active time in Mississippi. At the same time, she is soon

to be a candidate for parole in Mississippi, but she would not be released because of the Atlanta hold.

Ms. Williams therefore moves the Court for cancellation of the Mississippi writ; or, in the alternative, for modification thereof so that she can be returned to Mississippi for parole hearing(s). Ms. Williams further moves the Court for pre-trial release on bond and such combination of conditions as the Court deems appropriate.

This 30<sup>th</sup> day of October, 2015.

/s/ Albert Norton, Jr.  
Albert Norton, Jr.  
Georgia Bar No. 546760

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**CERTIFICATE OF SERVICE**

I certify that I served the foregoing DEFENDANT ANGELA WILLIAMS' MOTION FOR (1) PRE-TRIAL RELEASE; and (2) CANCELLATION OR MODIFICATION OF WRIT by ecf on the 30th day of October, 2015.

/s/ Albert Norton, Jr.  
Albert Norton, Jr.  
Georgia Bar No. 546760

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